

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2020-125-E**

Application of Dominion Energy South Carolina, Inc. for Adjustment of Rates and Charges (See Commission Order No. 2020-13)	) <u><b>UNITED STATES DEPARTMENT</b></u> ) <u><b>OF DEFENSE AND ALL OTHER</b></u> ) <u><b>FEDERAL EXECUTIVE</b></u> ) <u><b>AGENCIES' AMENDED SIXTH SET</b></u> ) <u><b>OF WRITTEN</b></u> ) <u><b>INTERROGATORIES AND</b></u> ) <u><b>REQUEST FOR PRODUCTION OF</b></u> ) <u><b>DOCUMENTS AND THINGS TO</b></u> ) <u><b>DOMINION ENERGY SOUTH</b></u> ) <u><b>CAROLINA, INC.</b></u>
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Pursuant to the Public Service Commission's Regulation 103-833, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby submits its Amended Sixth Set of Written Interrogatories and Request for Production of Documents and Things to Dominion Energy South Carolina, Inc.

**INSTRUCTIONS**

1. Responses to these request should be provided within 20 days of this request in writing and under oath.
2. These Requests are continuing in nature and require supplemental answers within a reasonable time if additional documents or information would be responsive to these Requests.

3. If any of the responses do not contain complete information, so state this and identify each person who may have the additional information.

4. Due to mandated teleworking due to COVID-19, please deliver responses electronically to [emilcy.w.medlyn.civ@mail.mil](mailto:emilcy.w.medlyn.civ@mail.mil).

### **DEFINITIONS**

1. “Company” is defined as Dominion Energy South Carolina, Inc.

2. “DESC” is defined as Dominion Energy South Carolina, Inc.

3. “DESS” is defined as Dominion Energy Southeast Services, Inc.

4. “DE” is defined as Dominion Energy

5. “Document” and “workpaper” shall have the broadest possible meaning and include, without limitation, the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any

of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

6. “Identify” or “identity,” when referring to a natural person, shall mean to provide without limitation his or her full name, present or last-known address, telephone number, present or last-known business affiliation and location, and job titles and responsibilities during the applicable time covered by any response referring to such person.

7. “Identify” or “identity,” when referring to a document or writing, shall mean to give sufficient characterization of the document or writing so as to have identified it with reasonable particularity and shall include, without limitation, the following information with respect to such document or writing:

- a. The author and the sender of the document or writing;
- b. The date appearing on the document or writing, and if it has no date, the answer shall so state but shall give the date or approximate date the document or writing was prepared;
- c. The general nature or description of the document;
- d. The name of the person or persons, if any, to whom such document or writing was addressed and the names of other persons to whom the document or copies thereof were given or sent, if any;
- e. The name and address of the person having present possession, custody, or control of the document or writing.

## **DOCUMENT AND INFORMATION REQUESTS**

**DOD/FEA-DESC No. 6-1. Property tax expense:** Please provide the electric utility net plant in service at December 31 of each year 2014, 2015, 2016, 2017, and 2018.

**DOD/FEA-DESC No. 6-2. Property tax expense:** Please provide the electric utility property tax expense for each year 2015, 2016, 2017, 2018, and 2019.

**DOD/FEA-DESC No. 6-3. Property tax expense:** The work paper used to calculate the increase in property tax expense (Attachment 1-5 PF Adj #7 Annualize Property Tax Expense.xlsx) shows an increase in net plant of 1.3%  $((\$6,190,047,701/\$6,113,265,369)-1)*100$ , and the same work paper shows an increase in property taxes of 8.1%  $((14,26,553/175,106,172)*100)$ . Please identify, quantify, and explain the issues that caused the property tax expense to increase at a rate of more than six times the rate of increase in net plant in service.

**DOD/FEA-DESC No. 6-4. Employee health care cost:** Please provide the employee health care cost in the format of the tab Worksheet in the file Attachment 1-5 PF Adj #3 Annualize Healthcare Costs by month for each year 2015 through 2019.

**DOD/FEA-DESC No. 6-5. Voluntary retirement program:** Please provide the voluntary retirement program's total expected annual savings in payroll cost, benefits cost, and payroll taxes.

**DOD/FEA-DESC No. 6-6. Voluntary retirement program:** Please provide the voluntary retirement program's annual savings in payroll cost, benefits cost, and payroll taxes that are reflected in pro forma expenses.

**DOD/FEA-DESC No. 6-7. Voluntary retirement program:** Please provide the voluntary retirement program's total itemized cost.

**DOD/FEA-DESC No. 6-8. Voluntary retirement program:** Please provide the cost of the voluntary retirement program included in pro forma expenses

**DOD/FEA-DESC No. 6-9. Voluntary retirement program:** Please provide the period over which the voluntary retirement program's savings are expected to be realized.

**DOD/FEA-DESC No. 6-10. Voluntary retirement program:** Please provide the voluntary retirement program's total expected annual savings in payroll cost, benefits cost, and payroll taxes for employees that have retired after wages were annualized in Adjustment No. 1.

**DOD/FEA-DESC No. 6-11. Deferred costs:** For each deferred cost (other than regulatory assets and liabilities) for which the Company is seeking recovery, please provide any pro forma adjustments related to the item, an explanation of the item, the

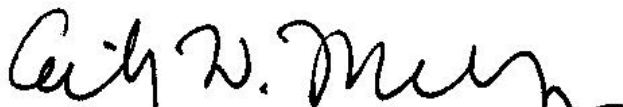
reason for including it in rate base or recoverable expenses, the benefit the ratepayers have received or will receive from the expenditure, the amount of costs deferred in each year, the period of time over which the cost will provide a benefit to ratepayers, the electric utility's return on equity for the South Carolina retail operations for each year during the deferral period, and any related statutes, orders, legal precedent or other available documentary support for including the item in rate base and pro forma expenses.

**DOD/FEA-DESC No. 6-12. Deferred costs:** For each deferred cost (other than regulatory assets and liabilities) for which the Company is seeking recovery, please provide an analysis of the item showing by month the related revenue or expense, increases and decreases to the accumulated deferred item with basic descriptive information, and the account balances. This analysis should begin with the later of the origination of the item or the last jurisdictional filing which included the item, and the analysis should continue through the latest available date. Please provide this analysis in Excel compatible format with fully functional formulas and source references for hard coded data.

**DOD/FEA-DESC No. 6-13. Production plant maintenance:** Please provide an analysis of the major overhauls of production plant showing for each unit the overhaul cost each year for the greater of ten years or two major overhaul cycles, showing the unit overhauled, the year of the overhaul, the cost of the overhaul, and the total annual cost recovered from ratepayers for major overhauls.

**DOD/FEA-DESC No. 6-14. Capacity cost:** For each deferred capacity purchase please provide the expenditures by year or the purchase, the dates when the contract begins and ends, the total cost deferred, the annual amortization included in the revenue requirement, and the statute, rule, or order authorizing the deferral.

Respectfully submitted,

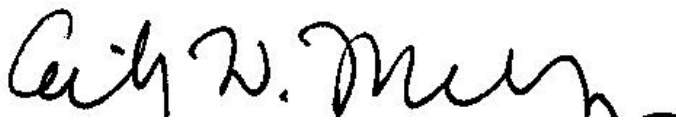


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October 20, 2020

**CERTIFICATE OF SERVICE**

I, Emily W. Medlyn, hereby certify that the foregoing document was served on all persons at the addresses listed in the Official Service List for Docket 2020-125-E on October 20, 2020.

A handwritten signature in black ink, appearing to read "Emily W. Medlyn", written over a horizontal line.

Emily W. Medlyn